



Maureen T. Coghlan
Member of New Jersey and
Pennsylvania Bar
mcoghlan@archerlaw.com
856-354-3034 Direct
856-795-0574 Direct Fax

Archer & Greiner, P.C.
1025 Laurel Oak Road
Voorhees, NJ 08043
856-795-2121 Main
856-795-0574 Fax
www.archerlaw.com

September 12, 2024

VIA ECF

Honorable Renée Marie Bumb, C.U.S.D.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Guy A. Shaked Investments, Ltd., et al. v. Ontel Products Corp.*
Docket No. 1:20-cv-9901 (RMB-EAP)

Dear Chief Judge Bumb:

This firm is counsel to Plaintiffs Guy A. Shaked Investments, Ltd. and DAFNI Hair Products, Ltd., (collectively “DAFNI”) in the above-referenced matter. We write jointly with counsel for Defendant Ontel Products Corporation (“Ontel”) to provide a status update.

Since the parties last reported to the Court in late July, DAFNI, has been actively engaged in the process of retaining new counsel in the United States. Unfortunately, this effort has taken longer than anticipated due to several complicating factors, including the fact that DAFNI, a family company, is located in Israel and the company’s Chief Executive Officer who is leading this effort has been called into active military service, and due to potential new counsels’ limited availability in the late summer months. For this reason, DAFNI respectfully requests an additional 60 days to allow DAFNI the time it needs to retain new counsel and to reengage in settlement discussions with Ontel. Accordingly, DAFNI proposes that the parties jointly report back to the Court by **November 11, 2024**.

As stated in the parties’ prior status letter of July 29, 2024 (ECF No. 260), Ontel continues to seek resumption of the litigation without unnecessary delay. Accordingly, Ontel respectfully requests that the Court establish a date-certain on which the case will resume rather than setting another joint report date. Ontel believes that such action would be appropriate given that over two months have elapsed since DAFNI’s prior litigation counsel moved to withdraw from this litigation (*see* ECF Nos. 257 and 258).

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If DAFNI's request meets with the Court's approval, we ask that Your Honor please enter "So Ordered" below. We thank the Court for consideration of this request.

Respectfully submitted,

s/ Maureen T. Coghlan

MAUREEN T. COGHLAN

MTC

cc: All counsel of record via ECF

It is SO ORDERED as of this ____ day of September, 2024.

HON. RENÉE MARIE BUMB, C.U.S.D.J.

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